

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

DOUGLAS SHYNE,
NATASHA SINGH,
a/k/a "Beatris Rodrigues,"
NATHANIEL SHYNE,
TOYBE BENNETT,
a/k/a "Dmitriy Makarovich,"
a/k/a "Dmitriy Makervisch,"
a/k/a "Eduardo Rodrigues,"
a/k/a "Cecilio Pena,"
ROBERTO MONTGOMERY,
EPHRAIM RICHARDSON,
NARESH PITAMBAR
JASON WATLER,
STEVEN RIDDICK,
NATANIEL ALEXANDER, and
TIMOTHY MONTGOMERY,

Defendants.

S4 05 CR. 1067 (KMK)

**MOTION TO ADMIT
TIMOTHY J. HEAPHY
*PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Richard L. Jarashow, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

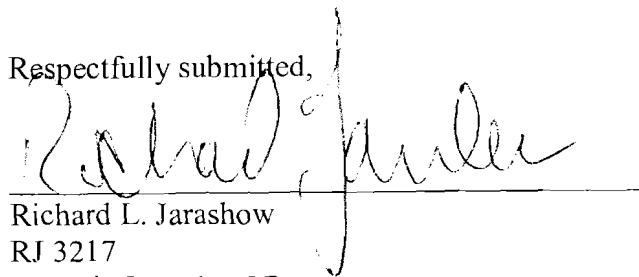
Timothy J. Heaphy, Esq.
McGuireWoods LLP
One James Center
901 East Cary Street
Richmond, Virginia 23219-4030
Phone: 804-775-4744
Facsimile: 804-698-2068

Timothy J. Heaphy is a member in good standing of the Bar of the Commonwealth of Virginia and District of Columbia.

There are no pending disciplinary proceeding(s) against Timothy J. Heaphy in any State or Federal Court.

Dated: 3/7/2007
New York, New York

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Richard L. Jarashow", is written over a horizontal line.

Richard L. Jarashow
RJ 3217

McGuireWoods LLP
1345 Avenue of the Americas, 7th Floor
New York, New York 10105-0106
Phone: 212.548.7016
Facsimile: 212.715.6272

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TIMOTHY MONTGOMERY,

Defendants.

**AFFIDAVIT OF
RICHARD L. JARASHOW
IN SUPPORT OF MOTION
TO ADMIT
TIMOTHY J. HEAPHY
PRO HAC VICE**

RICHARD L. JARASHOW, being duly sworn, hereby deposes and says as follows:

1. I am a partner at McGuireWoods LLP, counsel for Defendant Timothy Montgomery in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant Timothy Montgomery's Motion to Admit Timothy P. Heaphy as counsel *pro hac vice* to represent Defendant Timothy Montgomery in this matter.

2. I am a member of good standing of the Bar of the State of New York and was admitted to practice law on October 1, 1973

3. I have known Timothy J. Heaphy since January 2006

4. Timothy J. Heaphy is a partner at McGuireWoods LLP in Richmond, Virginia.

6. I have found Mr. Heaphy to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

7. Accordingly, I am pleased to move the admission of Timothy J. Heaphy, *pro hac vice*.

8. I respectfully submit a proposed order granting the admission of Timothy J. Heaphy, *pro hac vice*, which is attached as Exhibit A.

WHEREFORE it is respectfully requested that the Motion to Admit Timothy J. Heaphy, *pro hac vice*, to represent Defendant Timothy Montgomery in the above captioned matter, be granted.

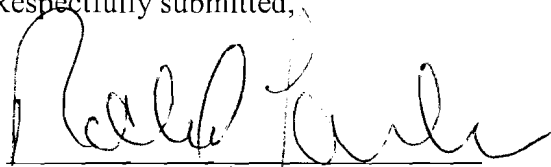
Dated: 3/7/2007

City, State: NEW YORK, NEW YORK

Notarized: 

EILEEN CHIN
Notary Public, State of New York
No. 01CH6075750
Qualified in New York County
Commission Expires June 10, 2010

Respectfully submitted,


Richard L. Jarashow
SDNY Bar Code: RJ 3217

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George W. Chabalewski
Bar Counsel



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Thomas A. Edmonds
Executive Director and
Chief Operating Officer

Mary Yancey Spencer
Deputy Executive Director

Elizabeth L. Keller
Assistant Executive Director
for Bar Services

Susan C. Busch
Assistant Executive Director
for Administration

February 28, 2007

CERTIFICATE OF GOOD STANDING

***THIS IS TO CERTIFY THAT TIMOTHY JOHN HEAPHY IS AN
ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING.
MR. HEAPHY WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON
JANUARY 12, 2005, AFTER ADMISSION ON MOTION THROUGH THE
SUPREME COURT OF VIRGINIA.***

SINCERELY,

**THOMAS A. EDMONDS
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER**

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Defendants.

S4 05 CR. 1067 (KMK)

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the Motion of Richard L. Jarashow, attorney for Defendant Timothy Montgomery
and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Timothy J. Heaphy, Esq.
McGuireWoods LLP
One James Center
901 East Cary Street
Richmond, Virginia 23219-4030
Phone: 804-775-4744
Facsimile: 804-698-2068
E-mail: theaphy@mcguirewoods.com

is admitted to practice *pro hac vice* as counsel for Defendant Timothy Montgomery in the above
captioned case in the United States District Court for the Southern District of New York. All

attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: _____, 2007
City, State: _____

United States District/Magistrate Judge

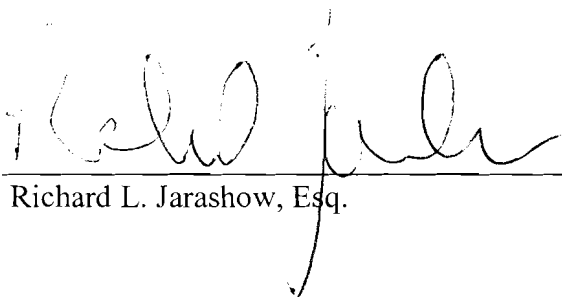
CERTIFICATE OF SERVICE

This is to certify that I have this day served a true and correct copy of the foregoing MOTION TO ADMIT *PRO HAC VICE* OF TIMOTHY J. HEAPHY by depositing same in the United States mail, properly addressed with sufficient postage affixed thereto to ensure delivery to all parties at the following addresses:

E. Danya Perry
U.S. Attorney's Office, SDNY (St Andw's)
One St. Andrew's Plaza
New York, NY 10007

Susan Vicki Tipograph
350 Broadway, Suite 700
New York, NY 10013

Dated: March 7, 2007



Richard L. Jarashow, Esq.